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Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case No.
19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF LAUREN T.
ATTARD IN SUPPORT OF EX PARTE
APPLICATION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR ENTRY OF AN ORDER
AUTHORIZING OVERSIZE BRIEFING
FOR THE REPLY IN SUPPORT OF
OMNIBUS OBJECTION TO CLAIMS
FILED BY CALIFORNIA GOVERNOR'S
OFFICE OF EMERGENCY SERVICES**

Relates to Dkt. Nos. 5096, 5320 & 5743

1 Lauren T. Attard, under penalty of perjury, declares:

2 1. I am an attorney at Baker & Hostetler, LLP ("**Baker Hostetler**"), counsel to the
3 Official Committee of Tort Claimants (hereafter, the "**TCC**") in the above captioned chapter 11
4 cases of PG&E Corporation and Pacific Gas and Electric Company (collectively, the "**Debtors**" or
5 "**PG&E**").

6 2. I submit this Declaration in support of the Ex Parte Application of the Official
7 Committee of Tort Claimants Pursuant to B.L.R. 9013-1(c) for Entry of an Order Authorizing
8 Oversize Briefing of Reply in Support of Omnibus Objection to Claims Filed by California
9 Governor's Office of Emergency Services [Dkt. No. 5096] (the "**Application**"). The Application
10 is filed concurrently herewith.

11 3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts
12 set forth herein.

13 4. On December 12, 2019, the TCC filed an objection ("**Objection**") to the claims of
14 California Governor's Office of Emergency Services ("**Cal OES**") [Dkt. No. 5096].

15 5. On January 9, 2020, the TCC filed a supplement to the Objection [Dkt. No. 5320].

16 6. On February 12, 2020, Cal OES filed its opposition ("**Opposition**") to the TCC
17 Objection [Dkt. No. 5743]. This Opposition brief was 37 pages.

18 7. The TCC now seeks to file its reply to the Objection (the "**Reply Brief**").

19 8. To adequately respond to the numerous issues raised in the Opposition, the TCC
20 respectfully submits it is necessary for the Reply Brief to exceed the 15-page limit.

21 9. I do not believe that the relief requested herein will prejudice Cal OES or interested
22 parties, nor do I believe the relief requested on behalf of the TCC is extraordinary or unreasonable
23 in light of the circumstances.

24 10. The TCC therefore respectfully requests that the Court enter an order allowing the
25 TCC to file a Reply Brief that exceeds 15 pages.

26 11. Prior to filing the Application, I contacted Matthew C. Heyn, counsel for Cal OES,
27 to inquire whether they would oppose or have no objection to the relief sought therein. Mr. Heyn
28 responded that Cal OES consents to the relief requested herein.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on February 19, 2020

By: /s/ Lauren T. Attard
Lauren T. Attard